

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

James E. Willis

Case: 2:21-mj-30191

Assigned To : Unassigned

Assign. Date : 4/23/2021

Case No.

Description: RE: JAMES WILLIS
(EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

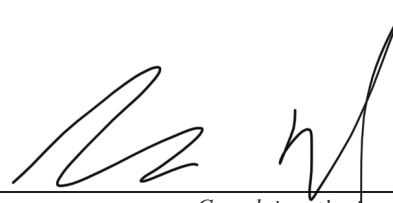
On or about the date(s) of 4/23/2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. § 841(a)(1)

possession with intent to distribute a controlled
substance

This criminal complaint is based on these facts:

see attached affidavit

☐ Continued on the attached sheet.*Complainant's signature*James D. Richmond, Speical Agent DEA*Printed name and title*Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: April 23, 2021*Judge's signature*City and state: Detroit, MIHon. David R. Grand, United States Magistrate Judge*Printed name and title*

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, James Richmond, Special Agent with the United States Drug Enforcement Administration (DEA), being duly sworn, depose and state the following:

INTRODUCTION

1. Your affiant is a Special Agent of the DEA and has been so since November 2016. Prior to the DEA, I served 4 years in the Marine Corps with the Marine Occupational Specialty of an Infantry Officer. After completion of Infantry Officer Course, I was assigned as a Rifle Platoon Commander, and later deployed to Afghanistan, where I witnessed the cultivation and trafficking of opium.

2. My official DEA duties include investigating criminal violations of the federal narcotics laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, 846, and 848. I have received special training in the enforcement of laws concerning controlled substances as found in Title 21 of the United States Code. Some of the specialized training I have received includes, but is not limited to, classroom instruction concerning narcotics smuggling, money laundering investigations, conspiracy, complex investigations, and undercover. I have been involved in various types of undercover assignments, and in various drug investigations utilizing electronic surveillance, including the interception of wire communications, the debriefing of defendants, witnesses, and informants, as well as others who have knowledge of the distribution and transportation of

controlled substances, the laundering and concealing of proceeds from drug trafficking and the street gangs who participate in these illegal activities.

3. As a result of these investigative activities, I have conducted and participated in numerous investigations as a DEA Special Agent that have resulted in the seizure of marijuana, prescription pills, synthetic drugs, cocaine, methamphetamine, and heroin. I make this affidavit, in part, based on personal knowledge derived from my participation in this investigation and, in part, based upon information from oral and written reports about this investigation and others that I have received from United States law enforcement officers and Special Agents of the Drug Enforcement Administration. I am aware of the following information from several sources, including but not limited to, my own personal observations and participation in this investigation and my review and analysis of oral and written reports.

4. This affidavit is made in support of a criminal complaint for James WILLIS for possession with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

5. On April 23, 2021, DEA executed a federal search warrant at a single-family house at 16XXX Mark Twain Street, Detroit, Michigan. According to Wayne County property tax records, James WILLIS is the taxpayer on this property. DTE Energy records also show that the utilities on this property are paid

by Prosperous Investments Co., of which WILLIS is listed as the sole owner with the State of Michigan. WILLIS has a primary residence at a different location in a Detroit-area suburb but DEA has observed WILLIS at 16XXX Mark Twain Street on a regular, if not daily, basis since at least July 2020, except for those periods when WILLIS travels out of state, usually for about 4-7 days. When WILLIS is out of the state, there is minimal activity at 16XXX Mark Twain Street. However, when WILLIS is in the Eastern District of Michigan, DEA has observed regular foot and vehicle traffic at 16XXX Mark Twain Street for short durations and consistent with hand to hand transactions of narcotics. Based on my training and experience, this is consistent with 16XXX Mark Twain Street being used as a “stash house” for drugs and drug-trafficking activity. WILLIS was not at 16XXX Mark Twain Street at the time of the search but was arrested for probable cause at his suburban home.

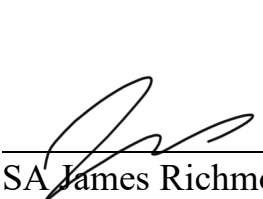
6. During the search of 16XXX Mark Twain Street, agents found at least one kilogram of a white powder which, based on my training and experience and that of other experienced agents at the search, and initial testing, appears to be cocaine. Agents also found several balls of suspected black tar heroin in a gallon-size plastic freezer bag weighing about 950 grams, along with other distribution quantities of other narcotics that appear to be fentanyl and crack cocaine. Agents also found other materials consistent with drug trafficking, including several

scales, blenders, strainers, plastic bags, and a food-saver device for vacuum sealing. There were also three presses in the house for different sized amounts, one of which appeared to still contain a small disc or puck of pressed heroin.

7. Agents also found a .40 caliber Smith & Wesson Shield pistol, with a receipt for items from Ace Hardware on top of it in the name of James WILLIS. There were also letters addressed to James WILLIS and other personal effects in the house. Agents also found a computer with a photograph of WILLIS as the screen saver.


CONCLUSION

8. Based on the facts stated above, there is probable cause to believe that James WILLIS has committed a violation of Title 21, United States Code, Section 841(a)(1).



SA James Richmond
Drug Enforcement Administration

Sworn to before me and signed in my presence and/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

April 23, 2021